

United States District Court for the Middle District of Pennsylvania

Charles Talbert

No. 21-1231

FILED  
SCRANTON

vs.

Honorable Judge Mannion

John Wetzel, et al.

Plaintiff's Motion To Amend

SEP 15 2021

PER

*[Signature]*  
DEPUTY CLERK

Plaintiff, Charles Talbert, moves this Honorable Court for permission to amend his complaint for the following reasons:

1. To add defendants: Department of Corrections, Lt. Hutchinson, Lt. Franklin, Sgt. Bilesta, Sgt. Everett, Of. Garcia, Of. Jones, Of. Silva, Of. Zagata, Of. Sims, Of. Donahue, Of. Shook, and Geisinger. The facts of the original complaint are basically the same, yet, other conditions of confinement were not mentioned due to lack of names.
2. To correct Defendant Adam Glushakows place of employment. He does not work at SCI Camp Hill. He works at SCI Phoenix.
3. To add the DOC as an "entity" in respect to Plaintiffs Title II of the Americans with Disabilities Act" claims.

The amendment is also to provide better detail on claims as in dates, etc, and to avoid amendment later on foreseeable motion to dismiss arguments. Attached hereto is the proposed amended complaint.

Respectfully submitted,

*Charles Talbert*

Charles Talbert

No. QPA727

SCI Camp Hill

PO Box 8837

2500 Lisburn Road

Camp Hill, Pa. 17001

September 10, 2021

U.S. Clerk of Court

U.S. Courthouse

Middle District

235 N. Washington Ave.

Scranton, PA. 18501

Re: Talbert v. Wetzel, et al., No. 21-cv-1231

Amended Complaint

Dear Clerk of Court:

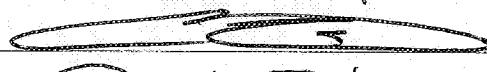
Enclosed herein, please find a true copy of my:

1. Motion To Amend

2. Amended Complaint w Supplemental Summons

Please note my new address above herein. Thanks!

Yours Truly,



Charles Talbert

United States District Court for the Middle District of Pennsylvania  
Charles Tolbert  
Department of Corrections; John Wetzel;  
Christopher Oppman; Todd Bickell; Tammy  
Ferguson; Keven Hanson; Jason Bobinski;  
Michael Coyne; Lt. Hutchinson; Lt. Franklin;  
Sgt. Bilesta; Sgt. Everett; Of. Garcia; Of. Jones;  
Of. Silva; Of. Zagata; Of. Maciejczak; Of. Sims;  
Of. Donahue; Of. Shock; Susan Kozminski;  
William Midkiff; Giselle Malet; Lea Martin;  
Wellpath; George Dominicis; Scott Prince;  
Centurion Medical; Erick Weinstein; Adam  
Glushakow; Gina Harrison; Geisinger.

No. 21-1231

Summons

To Said Defendants:

1. Department of Corrections, 1920 Technology Pkwy, Mechanicsburg, PA. 17050.

2. Lt. Hutchinson, Lt. Franklin, Sgt. Bilesta, Sgt. Everett, Of. Garcia, Of. Jones, Of.  
Silva, Of. Zagata, Of. Sims, Of. Donahue, and Of. Shock, SCI Dallas 1000  
Follies Road, Dallas, PA. 16612.

3. Geisinger,

You have been sued in court. You have 20 days to respond to the  
attached amended complaint. If you fail to do so, a judgment may  
be entered against you for the relief sought. Submit your answers  
and defenses with the Court as well as with the Plaintiff who can  
be reached at: Charles Tolbert, Q#4727, SCI Camp Hill, PA. Box 8837,  
2500 Lisburn Road, Camp Hill, PA. 17011.

Clerk of Court

Dated:

Charles Tallent

Q4727  
SCI CAMP HILL  
PO BOX 8837  
2500 Lisburn Rd.  
CAMP HILL, PA 17001

LEGAL

Office of the Clerk  
U.S. District Court  
Middle District of PA

U.S. Courthouse

235 N. Washington Ave.  
Scranton, PA. 18501-1148

RECEIVED  
SCRANTON

SEP 15 2021

PER  
10  
DEPUTY CLERK

INMATE MAIL

